

1 Cyrus Safa
2 Nevada Bar No: 13241
3 Law Offices of Lawrence D. Rohlfing
4 12631 East Imperial Highway, Suite C-115
5 Santa Fe Springs, CA 90670
6 Tel.: (562) 868-5886
7 Fax: (562) 868-5491
8 E-mail rohlfing.office@rohlfinglaw.com

Gerald M. Welt
6 Attorney at Law: 1575
7 411 E Bonneville Ave Suite #505
Las Vegas, NV 89101
Tel.: (702)382-2030
8 Fax: (702)684-5157
9 E-mail: gmwesq@weltlaw.com; kwp@weltlaw.com
Attorneys for Plaintiff DENISE SOUDER

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

14 DENISE SOUDER) Case No.: 2:19-cv-01165-APG-DJA
15 Plaintiff,)
16 v.) STIPULATION TO EXTEND TIME
17 ANDREW SAUL,) TO FILE MOTION FOR REVERSAL
18 Commissioner of Social Security,) AND/OR REMAND
19 Defendant.) (FIRST REQUEST)
20)
21)

Plaintiff Denise Souder and Defendant Andrew Saul, Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 7 days from November 1, 2019 to November 8, 2019 for Plaintiff to file a motion for reversal and/or remand, with all other dates in the Court's order extended accordingly. This is Plaintiff's first

1 request for an extension. Counsel had three hearings in the week leading into the
2 due date. In addition, Counsel had four motions due over two days, which counsel
3 could ordinarily have spread out. However, two weeks prior, Counsel received
4 orders to engage in settlement proceedings in five different matters over the next
5 14 days, which impacted Counsel's schedule as each case involved Counsel's
6 attention. Counsel respectfully requests an additional seven days to complete the
7 briefing in this matter.

8 | DATE: November 5, 2019

Respectfully submitted,

LAWRENCE D. ROHLFING

/s/ *Cyrus Safa*

BY:

Cyrus Safa
Attorney for plaintiff Mr. Denise Souder

14 | DATE: November 6, 2019

Nicholas A. Trutanich
United States Attorney

/s/ Allison J. Cheung

BY:

Allison J. Cheung
Special Assistant United States Attorney
Attorneys for defendant Andrew Saul
Commissioner of Social Security
|*authorized by e-mail|

IT IS SO ORDERED.

DATE November 7, 2019

**THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE**